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**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

Fund for Empowerment, a nonprofit corporation, in its individual capacity; Ronnie Massingille, individually; Mohamed Sissoko, individually; Dyrwood Moore, individually; Faith Kearns, individually; Frank Urban, individually; Timothy James, individually; Sherdina Carr, individually; Papy Abdul Idrissa, individually; and Jason Rich, individually,

Plaintiffs,

No. CV-22-02041-PHX-GMS

**NOTICE OF FILING SECOND
AMENDED COMPLAINT FOR
DECLARATORY AND INJUNCTIVE**

City of Phoenix, a political subdivision of the state of Arizona; Rachel Milne, individually, and in her official capacity as the Director of the Office of Homeless

1 Solutions; and Michael Sullivan
2 individually, and in his official capacity as
3 Interim Chief of the Phoenix Police
4 Department, Entities I-X, political
5 subdivisions of the state of Arizona; and
John and Jane Does 1-75, in their
individual capacities,

6
7 Defendants.
8

9 Plaintiffs give notice of the filing of their Second Amended Complaint for
10 Declaratory and Injunctive Relief, as permitted by this Court's Order dated April 9, 2024
11 (Doc. 137). Plaintiffs attach a redline version of the Second Amended Complaint which
12 details the differences of it from Plaintiffs' First Amended Complaint (Exhibit 1). Plaintiffs
13 separately filed their Second Amended Complaint.

14 Dated this 29th day of April, 2024.

15 AMERICAN CIVIL LIBERTIES UNION
16 FOUNDATION OF ARIZONA
17 By: /s/ Jared G. Keenan
Jared G. Keenan
Christine K. Wee

18 ZWILLINGER WULKAN
19 By: /s/ Benjamin L. Rundall
Benjamin L. Rundall

20 AMERICAN CIVIL LIBERTIES UNION
21 FOUNDATION
22 By: /s/ Leah Watson
Leah Watson, pro hac vice
Scout Katovich, pro hac vice

23 GOODWIN PROCTER LLP
24 By: /s/ Andrew Kim
Andrew Kim, pro hac vice
Collin M. Grier, pro hac vice
Madeline Fuller, pro hac vice

25
26 Courtney L. Hayden, pro hac vice

27 *Attorneys for Plaintiffs*
28

CERTIFICATE OF SERVICE

I hereby certify that on April 29, 2024, I electronically filed the foregoing with the Clerk of the Court for the U.S. District Court for the District of Arizona by using the CM/ECF System. All participants in the case who are registered CM/ECF user will be served by the CM/ECF system.

/s/Jared G. Keenan
Jared G. Keenan